

Message

From: Kraft, Andrew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4A94A4F199B247778ABB02285A51B927-KRAFT, ANDREW]
Sent: 2/13/2019 8:42:09 PM
To: Bussard, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cf26b876393e44f38bdd06db02dbbfe5-Bussard, David]
Subject: FW: oy vey - here we go again.

FYI

From: Champlin, Anna
Sent: Wednesday, February 13, 2019 11:31 AM
To: Bahadori, Tina <Bahadori.Tina@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>
Cc: Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Anna Champlin
National Center for Environmental Assessment
EPA Office of Research and Development
(Desk) 202-564-8074
(Cell) **Personal Matters / Ex. 6**

From: Bahadori, Tina
Sent: Tuesday, February 12, 2019 6:53 PM
To: Rieth, Susan <Rieth.Susan@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>
Cc: Champlin, Anna <Champlin.Anna@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

Very very good, Sue. On that one, we can say:

Deliberative Process / Ex. 5

From: Rieth, Susan
Sent: Tuesday, February 12, 2019 6:47 PM
To: Bahadori, Tina <Bahadori.Tina@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>
Cc: Champlin, Anna <Champlin.Anna@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Sue

From: Bahadori, Tina
Sent: Tuesday, February 12, 2019 6:44 PM
To: Soto, Vicki <Soto.Vicki@epa.gov>
Cc: Champlin, Anna <Champlin.Anna@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

Oh yes **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

From: Soto, Vicki
Sent: Tuesday, February 12, 2019 6:43 PM
To: Bahadori, Tina <Bahadori.Tina@epa.gov>
Cc: Champlin, Anna <Champlin.Anna@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris

<thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>

Subject: Re: oy vey - here we go again.

Deliberative Process / Ex. 5

Sent from my iPhone

On Feb 12, 2019, at 6:42 PM, Bahadori, Tina <Bahadori.Tina@epa.gov> wrote:

Deliberative Process / Ex. 5

From: Soto, Vicki

Sent: Tuesday, February 12, 2019 6:40 PM

To: Bahadori, Tina <Bahadori.Tina@epa.gov>

Cc: Champlin, Anna <Champlin.Anna@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>

Subject: Re: oy vey - here we go again.

Deliberative Process / Ex. 5

Sent from my iPhone

On Feb 12, 2019, at 6:37 PM, Bahadori, Tina <Bahadori.Tina@epa.gov> wrote:

OK, this is really hard to do.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

, this is what we can say:

Deliberative Process / Ex. 5

Let's see what the IOAA chooses to do.

T.

From: Champlin, Anna
Sent: Tuesday, February 12, 2019 3:45 PM
To: Soto, Vicki <Soto.Vicki@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Bahadori, Tina <Bahadori.Tina@epa.gov>
Cc: Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

Well as luck would have it, we received two media inquiries on the report asking for a response. See both inquiries below

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

1. From Chemical Watch. Deadline 8am tomorrow. At least the third bullet would not be for us to answer.

Inquiry:

I was wondering if EPA would like to respond to the Competitive Enterprise Institute [report](#) that published today, "EPA's Flawed IRIS Program is Not the Gold Standard", and the claim that the program "has a long history of sloppy research and lack of transparency that has advanced faulty and often counterproductive regulations that impose needless burdens on the public."

More specifically:

- The report claims that IRIS suffers from "excessive caution", and the agency tends to "focus on preventing worst-case scenarios—even absurd ones—and ignore more plausible scenarios, while ignoring more serious risks created by the EPA's own regulations." Does the agency agree/disagree?
- The report notes that in the 2018 NAS review, EPA got "modest praise for its reforms", but went on to say: "IRIS staff garnered some praise and avoided a critical review by keeping the scope of the NAS review extremely narrow." Would the agency like to address this?
- The report suggests that Mr. Wheeler is considering rolling IRIS into TSCA ("Wheeler would be wise to roll IRIS functions into the TSCA program, a possibility he seems to be considering."). Can you confirm the accuracy of this?
- Finally, on the comment that "Procedural reforms are unlikely to address the program's overly cautious culture. Rather, it is time to shut down IRIS, or at the very least give it a massive overhaul" - would EPA like to respond to this conclusion? Does the agency have any planned IRIS reforms on the horizon?

2. From IL News. Deadline 2pm tomorrow.

Inquiry:

<https://cei.org/content/epas-flawed-iris-program-far-gold-standard>

Considering EO is a hot topic in Illinois, I'm going to include this report in a story but wanted to get EPA perspective first.

Would you be so kind as to provide me with a response to the report's assessment of IRIS?

Anna Champlin
National Center for Environmental Assessment
EPA Office of Research and Development
(Desk) 202-564-8074
(Cell) Personal Matters / Ex. 6

From: Soto, Vicki
Sent: Tuesday, February 12, 2019 2:00 PM
To: Lavoie, Emma <Lavoie.Emma@epa.gov>; Bahadori, Tina <Bahadori.Tina@epa.gov>
Cc: Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Champlin, Anna <Champlin.Anna@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: RE: oy vey - here we go again.

So annoying that we can't comment!

From: Lavoie, Emma
Sent: Tuesday, February 12, 2019 1:59 PM
To: Bahadori, Tina <Bahadori.Tina@epa.gov>
Cc: Thayer, Kris <thayer.kris@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Champlin, Anna <Champlin.Anna@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>
Subject: Re: oy vey - here we go again.

At least Richard got a bit in there.

- Emma

On Feb 12, 2019, at 1:56 PM, Bahadori, Tina <Bahadori.Tina@epa.gov> wrote:

Frankly, not being in the news too much felt strange....

From: Thayer, Kris
Sent: Tuesday, February 12, 2019 1:55 PM
To: Bahadori, Tina <Bahadori.Tina@epa.gov>; Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Champlin, Anna <Champlin.Anna@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>; Shams, Dahnish

<Shams.Dahnish@epa.gov>

Subject: RE: oy vey - here we go again.

Ah, just when we thought we'd been forgotten about.

From: Bahadori, Tina

Sent: Tuesday, February 12, 2019 1:49 PM

To: Ross, Mary <Ross.Mary@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Lavoie, Emma <Lavoie.Emma@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Rieth, Susan <Rieth.Susan@epa.gov>; Champlin, Anna <Champlin.Anna@epa.gov>; Thayer, Kris <thayer.kris@epa.gov>; Avery, James <Avery.James@epa.gov>; Kraft, Andrew <Kraft.Andrew@epa.gov>; Soto, Vicki <Soto.Vicki@epa.gov>; Shams, Dahnish <Shams.Dahnish@epa.gov>

Subject: oy vey - here we go again.

Group calls for elimination of chemical-testing program

Cecelia Smith-Schoenwalder, E&E News reporter

Published: Tuesday, February 12, 2019

EPA headquarters in Washington. Robin Bravender/File/E&E News

EPA's program for toxic chemical risk assessments should be dissolved and its responsibilities split among other offices in the agency, the Competitive Enterprise Institute argued in a report released today.

The report, by Angela Logomasini, a senior fellow at the conservative business group, said the Integrated Risk Information System has problems with its methodology, relies on sloppy research and lacks transparency.

"Far from being the 'gold standard' for risk assessment, EPA's IRIS has a long history of flawed risk assessments based on faulty research that have led the agency to release counterproductive regulations," Logomasini said in a statement.

Logomasini said the program, which identifies and characterizes the health hazards of chemicals, is too cautious.

"Some may argue that it is sensible to be overly precautionary, but excessive caution can lead to regulations and market changes that can undermine safety and quality of life, ultimately doing more harm than good," the report said.

The report points to a piece of legislation from the 115th Congress as a possible solution.

The "Improving Science in Chemical Assessments Act," from Rep. Andy Biggs (R-Ariz.), would shift the chemical risk assessment process from IRIS to various program offices. The House Science, Space and Technology Committee passed the bill last year, but it was not taken up by the full chamber.

In 2011, a report from a National Academies of Sciences, Engineering and Medicine panel criticized IRIS for its handling of a formaldehyde risk assessment.

Logomasini argued that IRIS staff have worked to implement the report's recommendations but "progress has been sluggish at best."

However, a 2018 report from the National Academies found the program has made "substantial progress" in implementing recommended reforms (*E&E News PM*, April 11, 2018).

Improvements to IRIS were "glossed over or omitted in an effort to continue to demonize the program," Richard Denison, lead senior scientist with the Environmental Defense Fund, said of the report.

Denison also took issue with a specific line from the report: "[IRIS] operates outside the regulatory framework; therefore systems to ensure the scientific integrity of IRIS assessments are limited," the report said.

IRIS was designed to "increase scientific integrity by keeping regulatory decisions at arm's length," Denison said. The notion that the program's independence from regulatory offices would hurt its scientific integrity is "laughable," he added.

EPA did not respond to a request for comment on the report.